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December 23, 2024

VIA ECF

Hon. Colleen McMahon Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312

Re: P.A., et. al. v. New York City Department of Education, et al. 1:24-ev-04544 (CM)(BCM)

Dear Judge McMahon:

Please be advised that this firm represents the Plaintiffs in the above action. Plaintiffs brought this action seeking enforcement of an underlying Order as well as attorneys' fees, costs and expenses for legal work on multiple cases under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, et seq. (IDEA), as well as for this action.

The parties jointly respectfully requests a 45-day stay of this action to allow the parties to continue settlement negotiations. If a stay is granted, the parties proposes the submission of a joint status letter on or before February 11, 2025 updating the Court on the status of settlement negotiations. This is the parties' second request for a stay. We expect if granted, the stay will allow the parties to potentially resolve this case without burdening the Court with any motion practice, conferences or even filing of an answer.

I thank you in advance for the Court's consideration of this request.

Respectfully submitted,

Irina Roller

Attorneys for the Plaintiff

All counsel for Defendant via ECF

cc:

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